

# SMITH | VILLAZOR

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October 19, 2022

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court for the  
District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street Room 2C  
Newark, NJ 07101

**Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)**  
**Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions to allow him to attend the following:

- School activities about his children or in which his children are involved that take place at their elementary school in Lafayette, Colorado during the fall semester of 2022 and the spring semester of 2023; and
- Up to four church activities per month held at the Church of Latter-day Saints, 701 W. South Boulder Road, Louisville, Colorado. Any off-site church activity may be permitted by Pretrial Services and must be connected to the practice of religion.

Any such school activity or church activity must be approved by Pretrial Services. The time and location of each activity must be disclosed in advance, and any off-site church activity must be disclosed at least three days in advance. Mr. Goettsche must also be always accompanied by a third-party custodian to any school or church activity approved by Pretrial Services.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkt. 187, 193, 225, 229, 251 and 257). The Court previously denied a motion to modify bail conditions (dkt. 268).

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Pretrial Services has no objection to this proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.  
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cc: Matthew Menchel, Esq.  
Amanda Tuminelli, Esq.  
Government counsel of record (via ECF and e-mail)  
U.S. Pretrial Services Officer David Hernandez (via e-mail)  
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)